

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
JAN 26 4 40 PM '98

POSTAL RATE AND FEE CHANGES, 1997

OFFICE OF THE SECRETARY
Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA-T700-4-6)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Collins: USPS/OCA-T700-4-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2970; Fax -5402
January 26, 1998

USPS/OCA-T700-4. On page 6, lines 18-20 of your testimony, you state that “witness Degen has acknowledged that the insufficiency of the IOCS sample in estimating costs *is at least as severe for Library Rate as it is for Classroom*” (emphasis added).

- a) Have you examined the coefficients of variation (c.v.s) for clerks and mailhandlers mail processing estimated costs from the IOCS, presented by witness Degen in USPS-T-12, pages 13 and 24?
- b) Please confirm that the c.v.s for Classroom are approximately 3.5 times larger than the c.v.s for Library rate. If not confirmed, please explain.

USPS/OCA-T700-5. Please refer to page 10, line 6 of your testimony, where you propose that Special Rate costs should be used as a proxy for Library Rate costs.

- a) Is it your understanding that the Second Class Nonprofit estimate was used as a proxy for Classroom
- b) Are you aware of any evidence that IOCS tallies of Library Rate mail were erroneous? If so, please provide a specific citation to that evidence.

USPS/OCA-T700-6. Please refer to page 9, lines 6-8 of your testimony, where you posit that "... each migrating piece will cost at least 19 cents more than the revenue brought in."

a) Please provide the basis for the \$1.43 cited cost per piece for Library Rate mail.

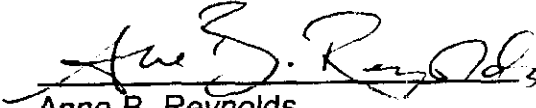
b) Please confirm that the 1996 CRA shows \$1.726 as the unit attributable cost for Library Rate mail. If not confirmed, please explain.

c) Please provide the basis for the \$1.24 cited rate per piece for Special Rate mail.

d) Please confirm that the 1996 CRA shows \$1.763 as the unit revenue for Special Fourth-Class Rate. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 26, 1998